

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

IN RE:) **Bankruptcy Case No. 23-20103-CMB**
John R. Smith and)
Lynda K. Smith,)
Debtors,) **Chapter 13**

John R. Smith and)
Lynda K. Smith,) **Doc. No.**

Movants,)
v.)
LoanDepot.com, LLC)

Respondent.)

DECLARATION OF PLAN
SUFFICIENCY FOR MORTGAGE PAYMENT CHANGE

1. Respondent filed a Notice of Mortgage Payment Change (the "Notice) on December 1, 2023.
2. The Notice indicates that the monthly mortgage payment shall change from \$501.11 to \$507.39 per month, assuming Debtors pay the escrow shortage of \$106.53 in full.
3. The debtor(s) paid the \$106.53 escrow shortage in full to Respondent.
4. The payment change takes effect February 1, 2024.
5. Undersigned counsel has reviewed the existing Chapter 13 plan and the plan funding and determines that the plan is sufficiently funded to implement the mortgage payment change.
6. Debtors request that the Trustee implement the Notice by changing the new total monthly payment amount to \$507.39 beginning with the payment due February 2024.
7. Contemporaneously with the filing of this declaration, the Chapter 13 Trustee and the affected creditor have been served with a copy of this declaration by electronic service.

Name of creditor: LoanDepot.com, LLC

Court claim number: 6 or (____) No claim filed.

/s/ Jana S. Pail

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